

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
VLADISLAV KLYUSHIN)
Defendant)
CRIMINAL NO. 21-cr-10104-PBS

WITNESS LIST

The defendant Vladislav Klyushin, by and through undersigned counsel, hereby respectfully advises the Court that the following individuals may be called as witnesses during Mr. Klyushin's case-in-chief:

1. David Tawil – Ocean, NJ
 2. J-Michael Robert – Corvus Forensic, Brooklyn, NY
 3. Michael Cullan – Brooklyn, NY
 4. Vladislav Klyushin

Mr. Klyushin reserves the right to call additional witnesses, including witness for which the government has yet to produce interview notes or reports, and, rebuttal witness, if and when he determines they will be required.

Respectfully Submitted,
Vladislav Klyushin,
By His Attorney,

/s/ Maksim Nemtsev
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Dated: January 23, 2023

CERTIFICATE OF SERVICE

I, Maksim Nemtsev, hereby certify that on this date, January 23, 2023, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.